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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

THOMAS FARLEY,

Plaintiff,

v.

NET ELEMENT, INC., OLEG FIRER,
JON NAJARIAN, JOHN ROLAND, and
TODD RAARUP,

Defendants.

Case No: 1:21-cv-03233-BMC

**NOTICE OF VOLUNTARY DISMISSAL
PURSUANT TO FED. R. CIV. P.
41(a)(1)(A)(i)**

PLEASE TAKE NOTICE that, pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff Thomas Farley hereby voluntarily dismisses the above-captioned action. Defendants have not served an answer or a motion for summary judgment.

Dated: September 8, 2021

Respectfully submitted,

HALPER SADEH LLP

By: /s/ Daniel Sadeh
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CERTIFICATE OF SERVICE

I, Daniel Sadeh, hereby certify that on September 8, 2021, a true and correct copy of the annexed **NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i)** was served in accordance with the Federal Rules of Civil Procedure with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all parties with an email address of record who have appeared and consented to electronic service in this action.

Dated: September 8, 2021

/s/ Daniel Sadeh _____
Daniel Sadeh